

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

STEPHEN MCCOLLUM, *et al.*, §  
*Plaintiffs,* §  
§  
v. § CIVIL NO. 4:14-CV-3253  
§  
§  
BRAD LIVINGSTON, *et al.*, §  
*Defendants.* §  
§

**Exhibit 4**

1                   THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF TEXAS  
3                   DALLAS DIVISION

4         STEPHEN McCOLLUM, STEPHANIE      \*  
5         KINGREY, and SANDRA                  \*  
6         McCOLLUM, individually and as      \*  
7         heirs at law to the Estate of      \*  
8         LARRY GENE McCOLLUM,                 \*  
9   \*

10         PLAINTIFFS                           \*  
11   \*

12         vs.                                    \* CIVIL ACTION NO.  
13   \* 3:12-CV-02037

14   \*  
15         BRAD LIVINGSTON, JEFF PRINGLE,\*  
16         RICHARD CLARK, KAREN TATE,        \*  
17         SANDREA SANDERS, ROBERT EASON,\*  
18         the UNIVERSITY OF TEXAS             \*  
19         BRANCH and the TEXAS                \*  
20         DEPARTMENT OF CRIMINAL JUSTICE\*  
21   \*

22         DEFENDANTS                           \*  
23         ORAL VIDEOTAPED 30(B)6 DEPOSITION OF JEFF PRINGLE  
24   August 12th, 2013

25         ORAL VIDEOTAPED 30(B)6 DEPOSITION OF JEFF  
26         PRINGLE, produced as a witness at the instance of the  
27         Plaintiffs and duly sworn, was taken in the above-styled  
28         and numbered cause on the 12th day of August, 2013, from  
29         10:33 a.m. to 1:33 p.m., before Curtis High, Certified  
30         Shorthand Reporter in and for the State of Texas,  
31         reported by computerized stenotype machine at the  
32         Hutchins Unit of the Texas Department of Criminal  
33         Justice, 1500 E. Langdon Road, Dallas, Texas 75241,  
34         pursuant to the Federal Rules of Civil Procedure and the  
35         provisions stated on the record or attached hereto.

1 A No.

2 Q Okay. When you made this request to  
3 Ms. Gilford, and I apologize, the other person's name  
4 from UTMB, was that before or after Mr. McCollum's  
5 death?

6 A I would have asked them if they had a video  
7 before the...

8 Q Before the death?

9 A After the death.

10 Q After the death?

11 A Before the mediation.

12 Q Do you know if anybody else has suffered any  
13 heat exhaustion at the -- at the Hutchins Unit following  
14 Mr. McCollum's death?

15 A Yes.

16 Q Do you know what happened in that incident?

17 A As testified in my previous deposition it was  
18 an employee that was working from -- on the outside  
19 visitation who felt ill.

20 Q What about inmates? I thought there was at  
21 least one inmate who suffered a heat exhaustion or heat  
22 related illness at the Hutchins Unit. Am I mistaken?

23 A He was working in the boiler room which is a  
24 hot working environment and became ill.

25 Q How hot is the boiler room?

1 A I do not know.

2 Q Does anybody ever take temperatures in there?

3 A No.

4 Q Do you know if he was on any heat list?

5 A No, I do not.

6 Q If he was on a heat list should he have been  
7 working in the boiler room?

8 A If he was on the list he would have been  
9 reassigned.

10 Q Okay. Just so I am clear, if that particular  
11 person had let's say hypertension or some condition  
12 which made him vulnerable to the heat, he should not  
13 have been working in the boiler room?

14 MR. GARCIA: Objection, speculation.

15 THE WITNESS: Not that he should not. He  
16 would have been reassigned.

17 Q (By Mr. Edwards) Why would he have been  
18 reassigned?

19 A Because boilers are hot.

20 Q That the only reason?

21 A Yes.

22 MR. EDWARDS: All right. I want to thank  
23 you very much and I pass the witness.

24 MR. GARCIA: Can I get that microphone?

25 EXAMINATION